

SUZANNE GREENE  
SUZANNE GREENE vs TYLER TECHNOLOGIES

August 29, 2019

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1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF GEORGIA  
3 ATLANTA DIVISION

4  
5 CIVIL ACTION NO: 1:19-CV-01338-AT

6  
7 SUZANNE GREENE,

8 Plaintiff,

9 vs.

10 TYLER TECHNOLOGIES,

11 Defendant.

12  
13 DEPOSITION OF: SUZANNE GREENE

14 AUGUST 29, 2019

15 9:53 A.M.

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1 Q. (By Mr. McKeeby) So your  
2 clients -- I assume you anticipated my next  
3 question. Your clients are no longer  
4 government entities, I take it, since -- at  
5 O'Ryan?

6 A. That is correct, yes, sir.

7 Q. They're law firms?

8 A. That is correct.

9 Q. And are you -- what's your  
10 position?

11 A. I'm a project manager here.

12 Q. Do you work out of your home?

13 A. I do not, no, sir.

14 Q. What office do you report to?

15 A. Right in Marietta.

16 Q. And when did you first start  
17 working at O'Ryan?

18 A. June of this year.

19 Q. And are you paid salary or by the  
20 hour at O'Ryan?

21 A. I'm paid salary.

22 Q. Do you receive overtime?

23 A. I do not, no, sir.

24 Q. What's your salary?

25 A. It's 60,000.

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1 Q. And I take it you interviewed for  
2 a position at O'Ryan?

3 A. I did, yes, sir.

4 Q. And did you present them with a  
5 copy of your resume?

6 A. Yes. Excuse me, let me actually  
7 back up a little bit. I didn't give them the  
8 copy of the resume there. I had applied on  
9 Indeed and uploaded the copy of my resume on  
10 Indeed. So they received my resume from  
11 Indeed.

12 Q. Thank you for --

13 A. Yes.

14 Q. -- that correction.

15 (Whereupon, Exhibit 2 was marked  
16 for identification.)

17 Q. (By Mr. McKeeby) I've marked as  
18 Deposition Exhibit 2 what's been produced in  
19 this case as your resume. Would you agree  
20 with that characterization?

21 A. Yes, sir.

22 Q. Is this, as far as you know, a  
23 true and correct copy of the resume that you  
24 presented to O'Ryan in connection with your  
25 employment?

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1 A. Yes, sir.

2 Q. And did you present this -- well,  
3 I don't know how to honor your correction. Do  
4 you have an understanding that this resume was  
5 presented to other employers as well or just  
6 O'Ryan?

7 A. I don't understand that  
8 question, I'm sorry.

9 Q. You uploaded a resume on Indeed, a  
10 job site service; correct?

11 A. Yes, sir.

12 Q. This is the resume that you  
13 uploaded?

14 A. Yes, sir.

15 Q. Were there any other versions of  
16 the resume that you utilized since your  
17 employment with Tyler other than this  
18 document?

19 A. No, sir.

20 Q. Did you actually provide this  
21 resume to any employers other than through  
22 Indeed?

23 A. No -- hold on, let me back that  
24 up. Because I also uploaded this on  
25 LinkedIn. So then, I guess that would also

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1        technically count for other people getting it  
2        off of Indeed.

3            Q.        So you uploaded the resume on  
4        LinkedIn as well as Indeed?

5            A.        Yes, sir.

6            Q.        And I guess you would agree with  
7        me that the resume is truthful and accurate?

8            A.        Yes, sir.

9            Q.        Is -- in terms of your job duties,  
10       I understand it's a different kind of software  
11       with a different kind of client. But is the  
12       project manager position that you have with  
13       O'Ryan similar to the project manager position  
14       that you had during the first several months  
15       of your employment with ExecuTime before the  
16       Tyler acquisition?

17            A.        Similar in what ways?

18            Q.        Any ways?

19            A.        So in certain ways, yes, because  
20       I am -- I'm actually managing the projects  
21       with this company, I'm not assisting.

22            Q.        Okay. And you were assisting  
23       while you were at ExecuTime because you were  
24       new, as you testified to, and Mr. Jenkins and  
25       you worked together; correct?

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1 course.

2 Q. What else?

3 A. Um --

4 Q. Travel?

5 A. Yes, yes, sir. And I would  
6 travel and do those specific things, like go  
7 train people and travel, yes.

8 Q. Right. Obviously, you're  
9 traveling to do some of these things, but  
10 you're also traveling as part of your job?

11 A. Yes, sir.

12 Q. What other duties did you have,  
13 again, just sort of listing them by category?  
14 Are there any other duties?

15 A. Not that I can think of off the  
16 top of my head.

17 Q. We can come back to it if we need  
18 to.

19 A. Okay.

20 Q. Just so that we're clear, are you  
21 comfortable if I refer to the ExecuTime  
22 software -- you mentioned that it's divided  
23 between time and attendance -- the time and  
24 attendance module and the advanced scheduling  
25 module. But it all relates to payroll;

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1 correct?

2 A. Essentially, that is the end

3 result, is producing the actual payroll.

4 Q. I mean, that's what the objective  
5 of the software is, to make sure the payroll  
6 is done properly; correct?

7 A. So we don't actually do the  
8 payroll portion, but to make sure that the  
9 time is accurate, yes.

10 Q. And the time needs to be accurate  
11 because if it's not, then the compensation  
12 won't be accurate?

13 A. That is correct.

14 Q. So you would agree with me that --  
15 that it was critical that the software be --  
16 that the software perform correctly?

17 A. Yes, sir.

18 Q. And, for example, as I understand  
19 it, before you could quote, Go-Live, unquote  
20 with the software, you actually had to have  
21 two test runs before the hand to make sure the  
22 software was operating properly; correct?

23 A. That is correct.

24 Q. And the concept of going live,  
25 tell me what that means.

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1 testing, for the most part.

2 Q. Did you ever have a situation  
3 after Go-Live when the software didn't work  
4 properly that you were involved in while you  
5 were at Tyler?

6 A. After the Go-Live? I'm just --  
7 I'm trying to just think if there were any  
8 situations, because essentially, once they  
9 Go-Live, they go over to support. So I don't  
10 deal with them, once they go to support,  
11 they're off my plate and I'm completely done  
12 with them.

13 Q. And there's a concept of being  
14 passed to support; correct?

15 A. Yes, sir.

16 Q. And that's at the end of the  
17 implementation process?

18 A. Yes, sir.

19 Q. And is that before or after  
20 Go-Live?

21 A. After Go-Live, the project  
22 manager then steps up to transfer them over  
23 to support.

24 Q. And the project manager would  
25 consult with you in connection with passing

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1 the client to support; correct?

2 A. Yeah. Well, they're involved

3 the whole way, so they know where the client

4 is. And because we were in so much contact

5 with different scenarios, when I would reach

6 out to the project manager, they knew where

7 the client was, you know, the whole time

8 through parallel testing and stuff.

9 Q. They knew -- the project manager

10 would know based on communications from you?

11 A. That is correct, yes, sir.

12 Q. And so you would be updating the

13 project manager periodically about how the

14 implementation was going, were they meeting

15 deadlines, were they ready to be passed to

16 support, that type of thing?

17 A. Yes. And the project manager

18 also -- so different project managers handle

19 it currently.

20 Q. Okay.

21 A. When I was with Talia, she would

22 request and receive all of the checklists

23 throughout the process. So she knew very

24 well where everyone was at, because she's

25 requesting the documents that are needed to

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1 A. Yes, sir.

2 Q. Okay. And would you be on that  
3 call typically?

4 A. I just started being on those  
5 calls probably around December or January,  
6 but before, no, I was never on those calls.

7 Q. And just so we're clear, support  
8 is a different service that the client  
9 purchases when they buy the ExecuTime  
10 software; correct?

11 A. I'm not sure how that goes on  
12 the sales side.

13 Q. Okay. But you know -- you would  
14 review the client contracts as part of your  
15 preparation for particular implementations;  
16 correct?

17 A. Yes, sir.

18 Q. But those contracts didn't discuss  
19 support or you just don't remember?

20 A. I don't recall. That may have  
21 been something that was just included, but  
22 I -- honestly, I'm not sure.

23 Q. And did you have discussions with  
24 your project managers about where clients were  
25 as to whether or not they were ready to be

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1 passed through support?

2 A. Yes.

3 Q. And what would that be based on?

4 A. If there were any issues that

5 they ran into, if the time wasn't matching up

6 correctly, I mean, there could be numerous

7 different things that could prevent a

8 Go-Live.

9 Q. Well, I'm not talking about a

10 Go-Live, I don't think. I was saying, okay,

11 being passed to support -- which I understood

12 occurred after Go-Live?

13 A. Right. So essentially you have

14 to Go-Live to go to support. So my

15 apologies.

16 Q. No, that's all right. But I'm

17 going to make sure you were answering the

18 question you thought you were answering. So

19 in order to be passed to support, you had to

20 make sure that there were no technical issues,

21 I guess?

22 A. Yes, sir, that's correct.

23 Q. Okay. And you would discuss those

24 issues with the project manager?

25 A. If needed, yes.

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1 Q. And the project plan has various  
2 deadlines?

3 A. That the project manager does,  
4 yes.

5 Q. Okay. For training?

6 A. Uh-huh.

7 Q. For integration?

8 A. (Nodding.)

9 Q. Yes?

10 A. That is correct, yes, and the  
11 project manager sets all of those dates.

12 Q. Okay. So that's a checklist that  
13 you have when you take over -- when the  
14 implementation is handed off to you?

15 A. I can see the dates, yes.

16 Q. Were there any situations where  
17 you had to -- you being Tyler, had to postpone  
18 a Go-Live date?

19 A. Oh, yes, for sure. That was not  
20 uncommon.

21 Q. That could be the result of  
22 technical issues?

23 A. Could be -- it could be  
24 technical issues, it could be time not adding  
25 up. It could be they just need more time. I

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1 mean, it could vary on numerous different  
2 things.

3 Q. Need more time to do what?

4 A. To maybe, you know, get more  
5 people in the application or whatever it is  
6 that they may need more time for. Sometimes  
7 they have other things coming up or other  
8 projects, things of that sort.

9 Q. And that could, for example, delay  
10 the training?

11 A. It could, yes, sir.

12 Q. Did you ever have a situation  
13 where you delayed a Go-Live date because the  
14 training wasn't going well in the sense that  
15 the users -- I know there's power users and  
16 end users, but in situations where the users  
17 weren't picking up on the training as well as  
18 you thought they should have?

19 A. I mean, there has been  
20 situations; like there was one client where  
21 it was majority older -- I guess you could  
22 say seasoned people.

23 Q. Fair enough.

24 A. And with that, a lot of them  
25 didn't even know how to work, like, smart

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1 phones. I actually had to go on site and do  
2 a little bit more hand holding. So depending  
3 on the client, situations like that could  
4 happen, yes.

5 Q. What client was that?

6 A. Alexander County, they were in  
7 North Carolina.

8 Q. Okay. Did you have to delay the  
9 Go-Live date with them?

10 A. They drug their feet for a  
11 while. They were actually around for a  
12 couple of years because they were -- how is a  
13 nice way to put this. They were kind of  
14 doing their time, like, old school, where  
15 they were writing it all down on paper and --  
16 yeah.

17 Q. But that's a situation where the  
18 Go-Live date had to be changed?

19 A. Yeah, multiple times with them,  
20 they were around for a while. They kept  
21 putting it on -- because what you can do is  
22 but a project on hold, quote, unquote, where  
23 you basically put it on hold and then you  
24 pick back up when the client's ready.

25 Q. And is that a situation where you

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1       went to the customer's location to do what  
2       I'll call on-site training?

3           A.       Once I went on site, we were  
4       able to move through with the actual project.

5       But I did go on site for them, yes.

6           Q.       Was it -- on that project  
7       specifically, was it not originally  
8       contemplated that you would be going on site?

9           A.       I'm not sure. The project  
10      manager discusses all of that.

11       Q.       Okay. Did you report to the  
12      project manager what you observed in terms of  
13      the training in that example?

14       A.       Well, with that actual training,  
15      I only went on site for the power user  
16      training.

17       Q.       Okay.

18       A.       But yeah, I let her know they  
19      were elder and they were -- seasoned, I'm  
20      sorry, they were having a little bit harder  
21      time using the software.

22       Q.       Got it.

23               And that ultimately resulted in a  
24      delay of the original Go-Live date?

25       A.       Well, yeah, but they were --

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1 once I got them, they had already been  
2 lingering for about a year and a half with  
3 ExecuTime.

4 Q. Okay. But was it -- was there  
5 another Go-Live date that had to be postponed  
6 as a result of them being slow learners of  
7 having trouble using the software, for  
8 whatever reason, be it their seasonedness or  
9 otherwise?

10 A. Yeah. I want to say we had to  
11 push it out slightly, but it wasn't like  
12 another year or anything. They just needed a  
13 little bit more time to work in the  
14 application.

15 Q. Did -- what was the -- maybe a  
16 question that you can't answer but I'll ask  
17 it. Was there a typical duration of  
18 implementation process?

19 A. Typically, yes, about 120 days.

20 Q. Okay. Now, does that 120 -- I  
21 understand that's going to vary depending on  
22 some of the factors that we've already touched  
23 on. Is that a period that would be set forth  
24 in the contract?

25 A. I'm not sure they put it in the

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1                   A.        So essentially, when I get the  
2       actual client, I go through with the client  
3       and do, like, a power user training. And --  
4       excuse me, let me back up.

5                   Prior to the power user  
6       training, I go through the questionnaire and  
7       the solution design that the project manager  
8       had put together from the actual client. So  
9       I go through the information that they have  
10      gathered based on their specific policies and  
11      procedures.

12                  Q.        Based on the client's specific  
13      policies and procedures?

14                  A.        Yes, sir, that is correct. So  
15      based on the client's specific policies and  
16      procedures, and then I would do --

17                  Q.        Now, what are you reviewing? I'm  
18      sorry to interrupt.

19                  A.        The questionnaire and the  
20      solution design that the project manager put  
21      together with the client.

22                  Q.        Okay.

23                  A.        So they went through a series of  
24      questions with them and kind of noted, you  
25      know, everything down.

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1 Q. These are two separate documents?

2 A. Yes, sir.

3 Q. You would review those -- is this  
4 after handoff or before handoff?

5 A. This would be around the time of  
6 handoff, I would go through the documents.

7 Q. What would be your objective in  
8 reviewing the questionnaire and the solution  
9 design?

10 A. To see what their policies are  
11 and how the application needs to be set up.  
12 Because there are certain things that I would  
13 need to turn on -- like, in the system admin  
14 preferences, I guess we can call it, like the  
15 preferences option, where, for example, maybe  
16 some places use comp time and some places do  
17 not. It's as simple as going under the  
18 preferences and checking a box to allow them  
19 to actually use it.

20 Q. And you would know from the  
21 questionnaire -- or I guess both the  
22 questionnaire and the solution design, for  
23 example, whether or not this particular client  
24 used comp time?

25 A. Yes, sir.

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1 Q. And that would affect the initial  
2 setup?

3 A. Yes, sir.

4 Q. Would that be the next thing you  
5 would do in the process, would the initial  
6 setup?

7 A. Yes, once I go through the  
8 solution design and the questionnaire, then I  
9 do pretty much like a generic setup so to  
10 say, based off of their solution design for  
11 the power admin training that I'm going to do  
12 with them. Because I want to allow them to  
13 be able to see how they would use the  
14 software.

15 Q. Okay. And then would the next  
16 step in the process typically be the power  
17 admin training?

18 A. Yes, sir. Typically, yes.

19 Q. And that could occur either  
20 remotely or on site; correct?

21 A. Yes, depending on what the  
22 client and the project manager discussed.

23 Q. In terms of the implementations  
24 that you performed, generally -- or  
25 approximately, what percentage were remote

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1 versus on site, in terms of the training?  
2 A. So some clients would only do  
3 power admin on site. And then they would  
4 split up and do some of the end user, super  
5 user remote. Some would do it vice versa.  
6 So it really depends.

7 I would guesstimating about 40  
8 percent of them would go -- like 30 to 40  
9 would do onsite on different portions of the  
10 training.

11 Q. Okay. So -- so I think you  
12 answered my question but I want to make sure.  
13 So of all of the implementations that you did  
14 at Tyler, you were actually at the customer  
15 location approximately 30 to 40 percent of the  
16 time?

17 A. Around that, yes, sir.

18 Q. Okay. And the reason that you  
19 were on site could vary too, but typically  
20 would involve power user training?

21 A. Typically, yes, sir.

22 Q. And it may or may not involve end  
23 user and super user training?

24 A. Yes, sir.

25 Q. Okay. So I guess the -- we've

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1 my -- I guess you could say kind of like a  
2 calendar, so to say, of when these items are  
3 due.

4 Q. Okay.

5 A. I'll use that for --

6 Q. So the project plan contains the  
7 deadlines?

8 A. Yes, sir.

9 Q. Within these checklists?

10 A. Yes, sir. And additional  
11 details about what exactly is due on the  
12 checklist, it kind of breaks it all down for  
13 them.

14 Q. And because you were dealing with  
15 multiple implementations at any one time,  
16 that's what you mean when you have to manage  
17 the client implementations simultaneously?

18 A. Right.

19 Q. And so you would have to determine  
20 your schedule from week to week based on these  
21 deadlines?

22 A. That is correct, yes, sir.

23 Q. It wasn't like every week you got  
24 a schedule saying, hey, you need to do this on  
25 a particular date, and then Wednesday you need

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1 do initial setup for this project, and on  
2 Thursday, you need to do end user training?  
3 You didn't get itemized schedules delineating  
4 your functions on a week-to-week basis?

5 A. No, I did not.

6 Q. That's a true statement?

7 A. That is a true statement.

8 MR. HERRINGTON: Sir, would you  
9 repeat that question?

10 MR. MCKEEBY: No.

11 MR. HERRINGTON: Can you read  
12 it?

13 When lawyers say, Is that a true  
14 statement, I get worried.

15 MR. MCKEEBY: Oh, no, I just  
16 thought we had a double negative there.

17 MR. HERRINGTON: Okay.

18 MR. MCKEEBY: And I'll not  
19 repeat the question, I'll ask the court  
20 reporter to read it back.

21 (Record read.)

22 MR. HERRINGTON: Okay. Thank  
23 you.

24 MR. MCKEEBY: Okay. All right.

25 MR. HERRINGTON: I thought she

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1 Q. But you do lead the teams?

2 A. As far as when their due dates  
3 and things are concerned, I will reiterate  
4 that, yes.

5 Q. And the project objectives, how  
6 did you know what the project objectives were?

7 A. That was based off of the  
8 project manager. And what was within the  
9 actual project plan. So even though the  
10 project manager already goes through that  
11 with the client, it's still my job to make  
12 sure they understand they have to stay on  
13 that track.

14 Q. But you had to understand what the  
15 project objectives were?

16 A. Yes, sir, like as far as the  
17 checklists and things are concerned.

18 Q. You would determine those  
19 objectives by reviewing the solution design  
20 and the project plan?

21 A. More so the project plan.  
22 Because the solution design more so gives  
23 information of their internal policies and  
24 procedures and the project plan is what the  
25 project manager puts together, actually,

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1 putting dates for their deadlines.

2 Q. The next bullet and then we will  
3 take a break, if that's okay?

4 A. Sure.

5 Q. Strong leadership and delegation  
6 skills. To whom did you delegate tasks?

7 A. To the client.

8 Q. What kinds of things would you  
9 delegate to the client?

10 A. I would do certain things like,  
11 let's say, we had the power user checklist,  
12 so it's already listed out as far as what  
13 they need to do. And I would just delegate  
14 and say, okay, these are the specific items  
15 that need to be completed by this date,  
16 pretty much like reiterating the project plan  
17 that was already put together.

18 Q. So you're delegating particular  
19 functions associated with the implementation  
20 process to someone on the project team?

21 A. Can you repeat that for me?

22 MR. MCKEEBY: Can you read that  
23 back?

24 (Record read.)

25 THE WITNESS: Yes.

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1 be to perform the training?

2 A. Most of the time, yes.

3 Q. Okay. And then the next part of  
4 the fourth bullet says, "Track project against  
5 timeline, milestones and budget and revise as  
6 needed"?

7 A. That is correct.

8 Q. What would you be revising?

9 A. So with that, if there was  
10 something within the progress -- I'll just  
11 give you an example. Let's say that they're  
12 behind schedule as far as doing the end user,  
13 super user training, so prior to the  
14 trainings, there's generally a checklist that  
15 is required prior to. So, for example, you  
16 have the power user checklist, that's  
17 supposed to be completed prior to the end  
18 user, super user. If it was not, then at  
19 that point, I would reach out to the project  
20 manager to let them know, hey, this needs to  
21 be revised, we may need to push out the date,  
22 and then they would actually update the  
23 project plan.

24 Q. Okay. So you wouldn't actually  
25 revise the -- the revise in that bullet in

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1 your resume doesn't mean changing the actual  
2 terms of a document?

3 A. No. That's not what that means  
4 there, no.

5 Q. Right. It means communicating  
6 that something needs to be changed and then  
7 the project manager would make that change?

8 A. That is correct.

9 Q. Got it. Okay.

10 I set up the question about the  
11 training and I didn't ask what I wanted to.

12 So when you're at -- when you're  
13 training at the facility -- and I understand  
14 sometimes it happened on the web training too,  
15 where you weren't at the facility?

16 A. Yes.

17 Q. But when you were at the facility  
18 doing the training that you described, you're  
19 there by yourself; correct?

20 A. Sometimes.

21 Q. Typically?

22 A. Typically, yes.

23 Q. Okay. Who else, on those  
24 occasions that are atypical, would the project  
25 manager might also be there?

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1 So milestones are essentially -- they're kind  
2 of like a checklist so to say. But that's  
3 something that, you know, I would make sure  
4 that whatever the project manager put within  
5 the project plan, I need to ensure that the  
6 client's essentially meeting those.

7 Q. But is milestones the same as a  
8 deadline?

9 A. Pretty much, yes, sir.

10 Q. Okay. And if the client wasn't  
11 meeting a milestone or deadline, you would  
12 communicate that to the project manager?

13 A. Absolutely.

14 Q. And that's the kind of thing that  
15 might result in postponing a Go-Live deadline?

16 A. That could be one of the many  
17 reasons, yes.

18 Q. Now, what is the budgeting -- what  
19 is the budget -- the "Track progress against  
20 budget" mean?

21 A. So the budget, each client can  
22 purchase different amounts of hours. So  
23 depending on how many hours they had, that  
24 would be communicated from the manager to the  
25 project manager and myself.

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1 And for a short period of time,  
2 we were updating the actual -- within the  
3 project plan, there was a portion that would  
4 show the hours they had and then it would  
5 subtract the time that we were working on  
6 that. So if they got under, I believe it was  
7 10 or 12 hours, then I needed to notify the  
8 project manager so then they can speak to the  
9 client and have them purchase more hours, if  
10 necessary.

11 Q. Okay. Did you ever recommend to  
12 the client that they might need more hours?

13                   A.        Not unless I spoke to the  
14                   project manager first, no.

15 Q. Okay. You would recommend -- you  
16 would alert the project manager to the fact  
17 that they needed more hours based on the  
18 budget?

19 A. That is correct.

20 Q. Okay. And when you're saying  
21 "hours," you're meaning training hours?

22                   A.        Right.   Yes.   Yes, sir.   And  
23    those hours could also be used for some  
24    troubleshooting and setup and things of that  
25    sort as well.

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1 amount based off of what the project manager  
2 set up.

3 So it would actually -- all I  
4 would do is enter in the time that I worked  
5 that was actually billable, and it would  
6 deduct it automatically, so I didn't really  
7 have to factor anything.

8 Q. Well, but you did have to track  
9 the budget; correct? Is what your resume says  
10 or?

11 A. Yes. Yes. Yes, sir, that is  
12 correct.

13 Q. Okay. Now, am I right that there  
14 are -- one of the things that you did at the  
15 initial stage of an implementation would be to  
16 review the contract; did you do that?

17 A. Yes, sir.

18 Q. Okay.

19 A. I would briefly look over the  
20 contract; I didn't go into much detail with  
21 that.

22 Q. And would you agree with me that  
23 there were different types of contract options  
24 that the client had?

25 A. Yes, sir.

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1 things you did was "Provide effective training  
2 to maximize the use of the software"?

3 A. Yes, sir.

4 Q. So is it a true statement then  
5 that the effectiveness of your training  
6 affected whether or not the customer, client  
7 was able to maximize their use of the  
8 software?

9 A. Not necessarily, because it  
10 depends on if they're -- for example, like my  
11 seasoned client where my training was still  
12 the same as I do with every other client,  
13 they were just having a harder time  
14 understanding.

15 Q. Right. So I understand that  
16 effective training might not always lead to  
17 maximization of the use of the software.  
18 Right?

19 A. Yes.

20 Q. But if you provided ineffective  
21 training, you wouldn't expect that the  
22 maximization of the use of the software to  
23 occur; correct?

24 A. Correct.

25 Q. And then the last two bullets are

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1 Q. Okay. And how would you become  
2 aware that these problems were occurring? The  
3 client would advise you or were you able to  
4 see this during training or through some other  
5 way?

6 A. They would communicate that with  
7 me.

8 Q. Okay. They might communicate that  
9 to you during a weekly call, for example?

10 A. Absolutely, yes.

11 Q. Can you think of an example where  
12 an issue like this was communicated to you by  
13 a particular client?

14 A. I mean, Turlock, California, is  
15 a good example, because they used to run into  
16 different issues. One they had even -- was a  
17 visual issue within the application. So  
18 those types of troubleshooting would not be  
19 billable, but of course, we would still have  
20 to complete the troubleshooting.

21 Q. How did you know what was billable  
22 and what wasn't? Or did you make that  
23 determination?

24 A. Well, we would make the  
25 determination based off of the list that our

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1 implementation manager had sent out as far as  
2 what's billable and what is not.

3 Q. And troubleshooting wasn't on the  
4 list?

5 A. Well, certain troubleshooting  
6 is, yes. But if it had something to do with  
7 a defect, then no. You would basically  
8 troubleshoot and not bill the time.

9 Q. Okay. And so what troubleshooting  
10 would not involve a defect?

11 A. Overtime not populating, that's  
12 not a defect, that's just either the correct  
13 employee is not attached to the correct  
14 policy, that could be something as simple as  
15 under the preferences in the back end. But  
16 that's not necessarily a quote, unquote,  
17 defect.

18 Q. So when -- a situation when  
19 overtime wasn't populating in the software,  
20 would that be something you could address and  
21 fix yourself or would you have to escalate  
22 that?

23 A. Generally, that type of  
24 troubleshooting, I would be able to fix,  
25 because it's not very technical. It's just

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1 basically trying to copy the error that  
2 they're receiving.

3 Q. Were there types of errors that  
4 you trouble shot and then determined that you  
5 could not fix?

6 A. Absolutely.

7 Q. And those you would escalate to  
8 the...

9 A. First the project manager and  
10 then it would go to our tech team, which we  
11 would submit a ticket for them.

12 Q. Who would prepare the ticket?

13 A. I would.

14 Q. And when you say the "tech team,"  
15 is that a group that sits in Little Rock or  
16 was it a group that sits in Little Rock?

17 A. Not all of them are in Little  
18 Rock, because we have probably more remote  
19 employees than we do in office, but some of  
20 them are in Little Rock, yes.

21 Q. Would there be a specific tech  
22 person to whom you would submit the ticket?

23 A. No, it's whoever is available.  
24 It would go to a queue and I'm not sure how  
25 they distributed it on their side.

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1 Q. So you wouldn't get the contract  
2 at that point to review?

3 A. No, generally, we would have to  
4 go look up that information. We had, like, a  
5 shared drive where a lot of documents would  
6 be held at.

7 Q. Okay. So the notification from  
8 the implementation manager of the assignment  
9 would trigger your responsibility to look up  
10 the documents?

11 A. Yes, sir.

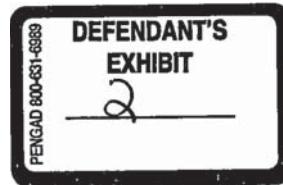
12 Q. And by the documents, at that  
13 point, we're talking about the contract with  
14 the client?

15 A. The solution design -- or well,  
16 excuse me, I'm sorry, solution design hasn't  
17 quite been there yet. Once it was my turn to  
18 take the project, that's when I would look up  
19 the documents; I didn't generally go in and  
20 look up the documents when it was assigned to  
21 the project manager.

22 Q. What documents could you have  
23 looked up when it was assigned to the project  
24 manager? You could look at the contract?

25 A. Just the contract at that point,

Suzanne F. Greene  
 Cell [REDACTED]  
 E-Mail: [REDACTED]



Objective: To obtain a leadership role in a company which offers opportunities for career advancement in a team oriented environment.

Employer: Tyler Technologies

Title: Implementation Consultant

Duration: February 2016 – Present

Job Duties:

- Manage multiple client implementations simultaneously, while meeting all project plan deadlines.
- Build, lead and direct project teams to meet project objectives
- Strong leadership and delegation skills
- Set clear expectations and goals for project teams. Track progress against timeline, milestones and budget, revise as needed
- Hold regularly scheduled meetings with the client to ensure that milestones are met
- Provide software application training using a variety of delivery methods including web-based and on-site training
- Coordinate new customer implementations, providing effective training to maximize use of the software
- Excellent communication (written and oral) and interpersonal skills
- Effective at engaging with people from all backgrounds and work industries

Employer: Allconnect

Title: Sales/Customer Service

Duration: August 2015 – January 2016

Job Duties:

- Detail oriented in order to ensure accuracy of information delivered to consumers and recorded for processing
- Utilizes consultative selling techniques to present key selling points, features and benefits while remaining focused on the customers' needs and expectations
- Demonstrates persistence, manage objections and strive to improve my skills and sales performance
- Effectively communicates and build relationships with customers to provide a world class customer experience
- Consistently exceed monthly sales objectives
- Effectively executes the entire sales process from opening to close while ensuring customer satisfaction

Employer: Highland Mortgage

Title: Loan Partner 1/Production Assistant

Duration: April 2014 – July 2015

Job Duties:

- Deliver performance excellence to mortgage/loan customers to ensure the origination of the relevant and appropriate loan products to meet their financial needs
- Observe the servicing practices of the mortgage branch team and management level associates from the customer perspective to develop and implement performance improvements
- Partner with manager and team to ensure operational excellence of the center and maintain a high level of customer satisfaction.
- Monitor the daily activities of the Branch including workflow, forecasting and customer satisfaction.

- Develop marketing strategies to build our customer base and maintain our current customer portfolio
- Create workforce stability by cultivating a productive and enthusiastic business team.
- Review team performance with manager and reinforce the accountability expectations for team and self.
- Establish communication, training and reporting processes to ensure the branch is operating to most current operational and security processes.
- Coach new hires to demonstrate professionalism, discretion and independent judgment, when performing work responsibilities.

Employer: Verizon

Title: Sales/Customer Retention/Service Representative

Duration: July 2006 – September 2013

Job Duties:

- Serviced 150 calls per day and resolved customer service inquiries on account related issues
- Achieved and maintained exceptional quality, productivity and sales results.
- Analyze customer portfolios to determine the best cross sell and upgrade opportunities
- Motivate team to maximize potential in all aspects of their job.
- Excellent verbal communication recommending relevant products to customers to deepen their business relationship with company
- Consistently exceeded incentive plans for top performing associates.
- Partner with executives to identify process improvements and develop counter measures to prevent the regression to previous ineffective performance practices
- Research and resolve escalated issues for customers and/or clients in an efficient and timely manner while transitioning to sales
- Take ownership for the resolution of customer complaints and resolved them in a manner that would ensure the retention of high valued customers
- Manage upset customers, conflicts and challenging situations
- Coached new team members to make a smooth transition to the live environment

Skills:

TSYS (Total Systems), Frontier, Microsoft Word, Excel, Outlook, and Power Point,